

DECLARATION OF DR. SCOTT LEVY

I, Dr. Scott Levy, declare as follows:

1. I am currently employed by Chevron U.S.A. Inc., a Pennsylvania corporation, as the Regional Medical Manager. From June 2017 until May 2024, my position served the Europe, Eurasia, Middle East & Africa region. I have personal knowledge of the facts set forth in this declaration, which are known by me to be true and correct. If called as a witness, I could and would competently testify concerning these facts under oath.

8 2. All candidates who are seeking an expatriate assignment must successfully pass a
9 Medical Suitability for Expat Assignment (“MSEA”) with the local medical team at the location of
10 the job site. The local team, who has superior knowledge regarding the circumstances and
11 resources available at their location, makes the final determination as to medical fitness for duty.

12 3. The MSEA standard for medical clearance is based on the MSEA Location Clusters
13 Table, which evaluates the relative level of safety in terms of medical care in categories from the
14 highest “A” to the least “D,” taking into account the promptness and availability of medical care in
15 those countries. A true and correct copy of the MSEA Location Clusters Table is attached here as
16 **Exhibit A.**

17 4. After Dr. Eshiofe Asekomeh determined that Plaintiff Mark Snookal was not cleared
18 to work in Escravos, I became involved in the matter when Mr. Snookal requested a second opinion
19 on the MSEA. Mr. Snookal communicated to me that he was interested in challenging the finding
20 that he was medically unfit for duty. While the local medical team would make the ultimate
21 determination as to Mr. Snookal's medical clearance, I agreed to speak with Mr. Snookal's
22 cardiologist and facilitate discussion with the local team regarding Mr. Snookal's medical clearance
23 to further consider whether Mr. Snookal could safely assume the expatriate assignment in Escravos.
24 With Mr. Snookal's permission, I communicated several times with Mr. Snookal's cardiologist, Dr.
25 Steven Khan, regarding Mr. Snookal's heart condition. A true and correct copy of Dr. Khan's email
26 correspondence to me regarding Mr. Snookal's heart condition, dated August 23, 2019, is attached
27 here as **Exhibit B**.

1 5. I discussed the contents of Dr. Khan's email with Dr. Asekomeh to determine
2 whether, in light of the information provided, Mr. Snookal could safely assume the expatriate
3 assignment in Escravos. Dr. Asekomeh reviewed the information provided by Dr. Khan, which
4 only addressed Dr. Khan's assessment of the risk of an occurrence, but not the lack of resources in
5 Escravos to provide treatment in the event of such an occurrence. Since the necessary medical
6 resources and immediate emergency responses were not available in Escravos, a rupture or
7 dissection occurring would most certainly result in death in Escravos. Given the catastrophic
8 outcome in such a scenario, Dr. Asekomeh maintained his determination that Mr. Snookal could not
9 be cleared for duty in Escravos.

10 6. I also conducted inquiries to determine whether the Reliability Engineering Manager
11 ("REM") position that he sought could be performed in Lagos, where Dr. Asekomeh did grant
12 medical clearance. However, I understand the essential duties of the REM position require on-site
13 supervision and interaction with personnel and equipment in Escravos, and the assignment could
14 not be moved to Lagos.

15 7. I did not have any final determination in whether Mr. Snookal ultimately received
16 medical clearance for the expatriate assignment in Escravos, nor in whether Mr. Snookal's offer for
17 the assignment was rescinded.

18 I declare under penalty of perjury under the laws of the State of California that the foregoing
19 is true and correct and that this declaration was executed on 8/21/24 at Houston,
20 Texas.



DR. SCOTT LEVY

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